

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

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GUSTAVO SANTOS,

Plaintiff,

16-cv-07107 (DLI) (VMS)

-against-

E T & K FOODS INC. d/b/a MET FOODS and
BET-ER BY FAR MEATS INC. d/b/a MET
FOODS and THOMAS KALLER, individually,

Defendants.

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**NOTICE OF MOTION BY THE LAW OFFICES OF JACOB ARONAUER FOR
SANCTIONS AGAINST E&K FOODS INC. and BET-ER BY FAR MEATS Inc. and
THOMAS KALLER individually and their counsel, ERIC RAPHAN**

PLEASE TAKE NOTICE that, upon the declaration of Jacob Aronauer and the memorandum of law, the Law Offices of Jacob Aronauer will move for sanctions against Defendants ET&K Foods Inc. and Bet-Er by Far Meats Inc. and Thomas Kaller, individually and their counsel Eric Raphan, before this Court, Hon. Dora Irizarry, District Judge at the United States Court House, United States District Court, 225 Cadman Plaza East, Brooklyn, NY 11201, for an order granting sanctions under the inherent authority to sanction a litigant for bad faith conduct and Section 28 U.S.C §1927 against Defendants and their counsel, Eric Raphan and such other and further relief as the Court deems just and proper.

Dated: June 20, 2018
New York, New York

The Law Offices of Jacob Aronauer

By: /s/ Jacob Aronauer
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